

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

MICHAEL CARRABES,

Plaintiff,

v.

EXPEDITORS INTERNATIONAL OF  
WASHINGTON, INC.,

Defendant.

Civil Action No. 1:24-cv-12142-PBS

**AFFIDAVIT OF MATTHEW J. LYNCH**

I, Matthew J. Lynch, hereby depose and state as follows:

1. I am over the age of twenty-one and give this affidavit of my own free will.
2. I make the statements contained in this Affidavit based on my personal knowledge.

I am competent to testify as to all facts stated herein.

3. I am an attorney with Littler Mendelson, P.C., One International Place, Suite 2700, Boston, MA 02110. I represent Defendant Expeditors International of Washington, Inc. (“Expeditors”) in this litigation, together with attorney Asha A. Santos of Littler Mendelson, P.C.

I make this Affidavit in support of Defendant’s Motion to Set a Status Conference.

4. Beginning on or about December 27, 2024, Expeditors received notice that its customers, managers, and members of its Board of Directors received e-mail communications from an anonymous Proton e-mail account, identified as “Secure.Report [secure.report.500@proton.me](mailto:secure.report.500@proton.me).” True and accurate copies of examples of these e-mails are attached hereto as Exhibit A and Exhibit B.<sup>1</sup>

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<sup>1</sup> Contact information, including the email addresses of recipients, has been redacted to protect confidentiality.

5. In one of these e-mails sent to customers, the anonymous sender alleges that Expeditors has engaged in “fabricated charges, coerced payments, and manipulated operational frameworks” and that “[t]he reputational risks of associated with EI are equally severe, as partnerships with a company under regulatory investigation and public scrutiny can irreparably damage client trust.” (Ex. A.)

6. These e-mails also contained the personal, private e-mail addresses and/or phone numbers of Expeditors employees, including, specifically, family members of Brian Carrabes, who is the brother of plaintiff Michael Carrabes (“Plaintiff”) and who Plaintiff claims terminated him during an argument on February 4, 2024. (Ex. B.)

7. On December 31, 2024, Brian Carrabes’ daughter received a vulgar e-mail from the same account.

8. On January 6, 2025, the parties in this matter attended a Zoom scheduling conference before Hon. Patti B. Saris, the judge to whom this matter was assigned at the time.

9. The only identified participants for this Zoom were (1) Judge Saris; (2) Maryellen Molloy, Judge Saris’ Courtroom Clerk; (3) attorney Adam P. Clermont (counsel for Plaintiff); (4) attorney Jeremia Pollard (counsel for Plaintiff); (5) attorney Asha A. Santos (counsel for Expeditors); and (6) myself (counsel for Expeditors). To the best of my recollection, one or two unidentified individuals also attended this Zoom conference but did not enable their Zoom cameras.

10. During this scheduling conference, I notified Judge Saris that Expeditors wanted to proceed to discovery promptly because Expeditors’ customers, employees and Board members had received anonymous, harassing e-mails related to Plaintiff’s allegations.

11. At 12:45 p.m. on Tuesday, January 7, 2025, I received an e-mail from Expeditors containing an e-mail sent from the same Proton e-mail address, [secure.report.500@proton.me](mailto:secure.report.500@proton.me). This e-mail contained an audio recording of the January 6, 2025 Zoom proceeding before Judge Saris. A true and accurate copy of this e-mail is attached hereto as Exhibit C.<sup>2</sup>

13. At 8:45 p.m. on Tuesday, January 7, 2025, I notified John M. Fleming, Courtroom Deputy Clerk for Hon. George A. O'Toole, to whom this matter was assigned at the time; and Maryellen Molloy, Courtroom Clerk for Judge Saris, who had been recorded, via e-mail of the unauthorized recording. Attorney Clermont and Attorney Pollard were copied on this e-mail. A true and accurate copy of this e-mail is attached hereto as Exhibit D.

Signed under the penalties of perjury this 4th day of February 2025.

*/s/ Matthew J. Lynch*  
Matthew J. Lynch

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<sup>2</sup> Contact information, including the email addresses of recipients, has been redacted to protect confidentiality. The referenced audio file will be provided to the Court in native form.

**CERTIFICATE OF SERVICE**

I, Matthew J. Lynch, hereby certify that on this 4th day of February 2025, the foregoing document was filed electronically through the ECF system, is available for viewing and downloading from the ECF system, and will be sent electronically to all registered participants identified on the Notice of Electronic Filing and via first-class mail to all non-registered participants identified on the Notice of Electronic Filing.

*/s/ Matthew J. Lynch*  
Matthew J. Lynch